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Subject: Comments for SBCC on Banning Natural Gas in New Construction

External Email

Greetings Building Code Officials:
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I have worked my career in the architectural field and retired in Ellensburg. I have studied climate issues for years and my group and I are currently helping educate the Ellensburg Utility Advisory Committee. The Ellensburg natural gas utility will be a covered entity under the Climate Commitment Act.

This means, as you are aware, that the natural gas utility will have to reduce its total emissions from about 40,000 metric tons of CO₂ today, to 45% below that baseline by 2030. This is a big task which will be supported by the cap and trade auctions beginning in 2023.

The Climate Commitment Act will help decarbonize the existing building inventory. It won't directly affect new construction, and so amendments to current codes is a requirement.

The Building Code Council has unique qualifications and scope to halt the installation of natural gas in new construction. The phased approach to code changes may have made sense in the past, but it is too slow going forward. We need imminent, urgent code changes.

Let me review some facts about natural gas as a building energy source.

Natural gas is not 'clean and natural' as the gas association marketing has lauded for decades. Indoors, it emits pollutants that have been studied and proven to harm human health.

And, of course, as we are all aware by now, natural gas emits about half the carbon dioxide as burning coal. That figure doesn't include methane fugitive leakage from infrastructure and extraction.

The gas associations and utilities would have you believe that 'gas is cheapest' to heat homes and businesses. This is another marketing strategy which is no longer true. Factually, cold climate heat pumps possess technology that allows customers to heat their homes and water for up to 1/3 the cost of heating compared to the highest efficiency natural gas furnace available.

If it costs \$1000 annually to heat a home with natural gas, it can cost about \$350 to heat the same structure with a cold climate heat pump system. These systems function to -12°F and include air conditioning in the same equipment.

While it may cost more installing heat pump systems than natural gas counterparts, costs of using these electric appliances are far lower than costs to use natural gas appliances. Customers, as a result of these facts, are better served by up-front costs which can be incorporated as a part of initial financing.

Natural gas for home and business heating, water heating and cooking is a dead end for all customers in this state starting now. Codes that allow natural gas to continue to be installed in new construction is committing those consumers to stranded assets. Costs for natural gas in the future will become increasingly volatile as the state and region decarbonize. All of which can potentially result in significant financial losses. Washingtonians as end use consumers, deserve the highest priority in all energy code issues.

It is imperative that all arms link together as we commit to 45% greenhouse gas reductions in only 7 years. Code cycles need faster timeframes, we need codes to intervene now.

This is the task of our collective lifetimes, and none more important. We need urgency in all we do.

I implore you to extract natural gas from new construction in our state, and ban it as an energy source now.

Thank you for your important work.

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